

Attorney Docket No. EBRY0003

U.S. Serial No. 10/724,521

**REMARKS**

Applicant thanks the Examiner for accepting various amendments made in Applicant's last entered submission and for withdrawing various objections raised. The remaining outstanding rejections concern a holding of anticipation under 35 USC102(b), and finding of obviousness under 35 USC 103.

First, Applicant notes that Claim 1 is now amended and is consistent with presently amended Claim 17. Accordingly, all of Applicant's remarks herein shall apply to both Claims 1 and 17. In particular, Applicant notes a new ground of rejection under 35 USC 102(b) in view of Wang et al. Applicant notes that Wang teaches an OCR system. Applicant has carefully reviewed the entire Wang reference and has paid particular attention to those portions of the reference cited by the Examiner.

Wang does not teach the notion of extracting quads in the sense that Applicant claims quads. The examples in Wang referred to by the Examiner do not teach individual words. The Examiner indicates that Wang may include individual words, but Wang does not specifically teach an individual word. In particular, with regard to Figure 13 of Wang, the only notion of text is that Wang seeks to separate text from non-text. Wang does not consider the notion of a quad down to a single word level. In sharp contrast, Applicant's invention creates a quad for each and every single word. Applicant clearly states this in Applicant's claim, where Applicant teaches that "each said quad comprises a bounding rectangle that defines a location of pixels in said image that correspond to an individual word". No such teaching is found in Wang.

Further, the Examiner maintains that Wang teaches a selection of regions of text based upon a user ordering. No such teaching is found in Wang. Wang teaches an automatic system that identifies text and non-text information during

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an OCR operation. There is no notion in Wang that a user may select portions of an image and receive back a display of that portion selected by the user.

Further, Wang does not teach the notion that user defined regions may be analyzed to develop a desired order of individual words in the regions "in accordance with a textual relationship between each of said individual words and in each of said selected regions and a textual relationship between each of the selected regions."

In view of the foregoing, Wang is not considered to be proper reference to recite against Applicant's claims and withdrawal of the rejection on that basis as indicated.

Should the Examiner deem it helpful, he is encouraged to contact Applicant's attorney, Michael A. Glenn, at (650) 474-8400.

Respectfully submitted,



Michael A. Glenn  
Registration No. 30,176

Customer No. 22862